

**To:** Downey, Shannon[downey.shannon@epa.gov]; Marshall, Sarah[marshall.sarah@epa.gov]  
**Cc:** Dennis J Warchol[dennis.warchol@veoliaes.com]  
**From:** David A Klarich  
**Sent:** Tue 7/2/2013 7:42:14 PM  
**Subject:** RE: Comments to Redlined Unit 2 CPT Plan

Shannon,

As we just discussed on the phone, we addressed comment 4 below by quoting straight out of the rule, since both of our versions were not word-for-word out of §63.1206(c)(3)(vii). The first sentence in Section 2.8.1 now reads:

§63.1206(c)(3)(vii) states "The AWFCO system and associated alarms must be tested at least weekly to verify operability, unless you document in the operating record that weekly inspections will unduly restrict or upset operations and that less frequent inspections will be adequate. At a minimum, you must conduct operability testing at least monthly."

Dave

Dave Klarich  
 Veolia ES Technical Solutions, L.L.C.  
 #7 Mobile Avenue  
 Sauget, IL 62201  
 618-271-2804, X120 office  
 618-271-9704 fax  
 david.klarich@veoliaes.com  
<http://www.veoliaes.com/>

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-----Original Message-----

**From:** Downey, Shannon [mailto:downey.shannon@epa.gov]  
**Sent:** Friday, June 28, 2013 1:46 PM  
**To:** David A Klarich; Marshall, Sarah  
**Cc:** Dennis J Warchol  
**Subject:** Comments to Redlined Unit 2 CPT Plan

Dave and Dennis,

Here are our initial comments on the Unit 2 test plan. There may be a few more on Monday but we wanted to get these to you as soon as possible. The numbers below correspond to the checklist sent on June 6, 2013.

We saw that you submitted the test plans for Units 3 and 4 this afternoon. We will review them Monday, but in the interest of saving time, it's probably a safe bet that these comments will apply to Unit 3 (and Unit 4 as appropriate) as well.

1. This should say "up to 720 hours"
2. Add language "Veolia will notify EPA of any changes made to wastes to be burned during the CPT prior to the test. Veolia will provide those new profiles to EPA."

3. Complete
4. The first sentence of 2.8.1 should say: " §63.1206(c)(3)(vii) provides for AWFCO operability testing to be performed at least weekly to verify operability, unless weekly inspections will unduly restrict or upset operations and that less frequent inspection will be adequate, but at a minimum, the testing must be performed monthly." Otherwise, it is alright.
5. Complete
6. Complete
7. Complete
8. Complete
9. N/A for Unit 2
10. Complete
11. Since you are testing at your current OPLS, we can accept average feedrates for this test plan.
12. Complete
14. Since you are testing at your current OPLS, we can accept average feedrates for this test plan.
15. Complete
16. Complete
17. Add the following statement: "A Standard Operating Procedure (SOP) for the preparation of the spiking materials by Veolia is included in the QAPjP. A Standard Operating Procedure (SOP) for the preparation of the spiking materials by Veolia is included in the QAPjP. Veolia will prepare the spiking materials in accordance with the referenced QAPjP for purposes of this CPT Plan."
18. Complete
19. EPA still needs to review this
20. Complete
21. Complete
22. Complete
23. Complete
24. EPA still needs to review this
25. Complete
26. "G-5" is the EPA Guidance for Quality Assurance Project Plans (QA/G-5). We requested the EPA Requirements for Quality Assurance Projects Plans (QA/R-5). The R-5 references the G-5 documents as a guidance for writing the QAPP. Is Veolia alright with referencing R-5?
27. Complete
28. Complete

Shannon Downey  
 Environmental Engineer  
 Air Enforcement & Compliance Assurance Branch U.S. Environmental Protection Agency, Region 5, (AE-17J)  
 77 W. Jackson Blvd  
 Chicago, IL 60604

Tel: (312) 353-2151  
 Fax: (312) 385-5398

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